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7 BRIAN STRETCH  
8 United States Attorney  
9 *Of Counsel*

10 *Attorneys for Plaintiff*

11  
12 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 v.  
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18 LISA ZAVIEH, individually, as the successor-  
in-interest to Amir Zavieh, and as the distributee  
19 of the Estate of Amir Zavieh, a/k/a Allen Zavieh,

20  
21 Defendants.

Case No. 4:17-cv-3286-KAW

**STIPULATION AND ~~PROPOSED~~  
ORDER TO ENLARGE NON-  
EXPERT DISCOVERY DEADLINE**

22 The United States of America and Lisa Zavieh, by and through undersigned counsel,  
23 hereby stipulate and request that the non-expert discovery deadline currently scheduled for July  
24 6, 2018 be enlarged to August 6, 2018, and state as follows:

25 1. On January 25, 2018, the Court entered a Case Management and Pretrial Order  
26 for Bench Trial (Docket No. 46).  
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2. Per the Court's Order, non-expert discovery shall be completed by July 6, 2018 and expert discovery shall be completed by August 6, 2018 (Docket No. 46).

3. The United States believes that it will be necessary to depose Martin Lack, who advised Amir Zavieh regarding his Swiss bank account. Mr. Lack currently resides abroad, but is willing to voluntarily appear for a deposition to be taken in Washington, D.C.

4. To accommodate Mr. Lack and counsel for Ms. Zavieh's travel schedules, the United States requests that the non-expert discovery deadline be extended to August 6, 2018.

5. Undersigned counsel for the United States has conferred with undersigned counsel for Ms. Zavieh and Ms. Zavieh agrees to this request.

6. This is the parties' first stipulation for an extension of the non-expert discovery deadline.

7. This request will not affect the schedule for the case.

WHEREFORE, the Parties hereby stipulate and request to enlarge the non-expert discovery deadline to August 6, 2018.

Respectfully submitted this 14th day of February, 2018.

RICHARD E. ZUCKERMAN  
Principal Deputy Assistant Attorney General

SIDEMAN & BANCROFT LLP

/s/ Yael Bortnick  
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/s/ Jay R. Weill  
JAY R. WEILL  
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BRIAN STRETCH  
United States Attorney  
*Of Counsel*

1 **[PROPOSED] ORDER**

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3 PURSUANT TO STIPULATION, and for good cause shown, IT IS HEREBY  
4 ORDERED that the non-expert discovery deadline is enlarged to August 6, 2018.

5 SO ORDERED this 20th day of February, 2018.

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8 HON. KANDIS A. WESTMORE  
9 United States Magistrate Judge  
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